

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

Twana Ahmed,

*Plaintiff,*

V.

**Universal Protection Service, LP,  
d/b/a Allied Universal Security  
Services**

*Defendant.*
































CIVIL ACTION NO. 4:23-cv-02823

## Jury Trial Demanded

**PLAINTIFF TWANA AHMED’S OBJECTIONS  
TO DEFENDANT’S WITNESS LIST**

**1. objection to unnamed, unidentified witnesses**

Twana Ahmed objects to Defendant's designation of "any witness" necessary for foundation or impeachment. *See* ECF No. 47, p. 7. Defendant does not name or otherwise identify any particular witness. *Id.* This does not provide fair notice for trial preparation for witness testimony.

**2. objection to overly broad testimonial topic**

Twana Ahmed objects to Defendant's stated testimonial topic: "allegations contained within the operative complaint." *See* ECF No. 47, pp. 1-6. The stated testimonial topic is overly broad and does not provide fair notice for trial preparation of each witness. Alternatively, Mr. Ahmed requests that all parties get the same broad leeway in designating testimony topics.

**3. objection to defendant's failure to identify witnesses it *will* call and *may* call**

Twana Ahmed objects to Defendant's failure to identify witnesses it *will* call at trial versus witnesses it *may* call at trial. *See* ECF No. 47. This does not provide fair notice for trial preparation for witness testimony, and violates the Court's Joint Pretrial Order procedures. *See* ECF Doc. 3-1, ECF p. 27.

Respectfully submitted,

/s/Amanda C. Hernandez

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CERTIFICATE OF SERVICE

The undersigned certifies that on May 9, 2025, *Plaintiff Twana Ahmed's Objections to Defendant's Witness List* was filed via the Court's CM/ECF system, thereby automatically serving Defendant's attorneys of record.

/s/Amanda C. Hernandez  
Amanda C. Hernandez